

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

-----x  
JOSEPH MANTHA on behalf of  
themselves and others similarly  
situated,

Plaintiff,

v. Case no. 1:19-cv-12235  
QUOTEWIZARD.COM, LLC,  
Defendant.

-----x

2:21 p.m.

July 28, 2020

VIDEOTAPED VIRTUAL DEPOSITION of LEAD  
INTELLIGENCE INC., by and through GEORGE RIOS, a  
non-Party in the above entitled matter, pursuant  
to Subpoena, before Stephen J. Moore, a Registered  
Professional Reporter, Certified Realtime Reporter  
and Notary Public of the State of New York.

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GEORGE RIOS

A P P E A R A N C E S

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New York, New York 100222

BY: ROGER MARION, ESQ.

1 GEORGE RIOS

2 THE VIDEOGRAPHER: We are on the  
3 record. The time is approximately 2:21  
4 p.m., on Tuesday, July 28th, 2020.

5 Please note microphones are  
6 sensitive and will pick up whispering and  
7 private conversations and cellular  
8 interference.

9 Please turn off all cell phones and  
10 place them away from your microphones as  
11 they will interfere with deposition audio.

12 Audio and video recording will  
13 continue to take place unless all parties  
14 agree to go off the record.

15 This is media unit 1 of the video  
16 recorded deposition of George Rios, taken  
17 for counsel for the Plaintiff in the  
18 matter of Joseph Mantha on behalf of  
19 themselves and others similarly situated  
20 versus Quotewizard.com, LLC.

21 The case is filed in the United  
22 States District Court for the District of  
23 Massachusetts, case number 1:19-CV-12235.

24 The deposition is being held via  
25 teleconference. I am Ken Williamson. I

1                                   GEORGE RIOS

2           am the videographer for Veritext New  
3           England. Our court reporter is Stephen  
4           Moore, also with Veritext New York.

5                   Please note I am not authorized to  
6           administer an oath I am not related to any  
7           party in this action, nor am I financially  
8           interested in the outcome.

9                   Counsel, please identify yourself  
10          and state your appearance for the record,  
11          beginning with the noticing attorney.

12                   MR. BRODERICK: Edward Broderick  
13          for the Plaintiff, Joseph Mantha.

14                   MR. POLANSKY: Good afternoon,  
15          Kevin Polansky for the Defendant,  
16          Quotewizard.

17                   MR. MARION: Roger Marion.

18                   And one correction, it's the  
19          deposition of George Rios on behalf of  
20          Plural Marketing Solutions, Inc., not just  
21          as an individual, and that is my client.

22                   MR. KING: And Evan King,  
23          representing RevPoint Media, LLC.

24                   THE VIDEOGRAPHER: Please swear  
25          in our witness.

1                                   GEORGE RIOS

2  
3       G E O R G E               R I O S,     called as a witness,  
4               having been first duly sworn by the Notary  
5               Public, was examined and testified as  
6               follows:

7  
8       EXAMINATION BY

9       MR. BRODERICK:

10  
11               Q           Good afternoon, Mr. Rios.   Just  
12       a couple of quick ground rules.

13                       I am going to ask you a series  
14       of questions, obviously, but I would just ask  
15       you to let me finish my question before you  
16       start your answer so that we have a clean  
17       record and it's easier to take down.

18               A           Understood.

19               Q           The other thing is all your  
20       answers will have to be verbal, meaning you  
21       can't nod or say um-hum.   We will just need a  
22       full answer so that it's clear.

23                       Can you tell me, state your full  
24       name for the record?

25               A           George Rios.

1                                   GEORGE RIOS

2                   Q           Where are you employed?

3                   A           Plural Marketing Solutions.

4                   Q           What's your job title there?

5                   A           I am the owner.

6                   Q           Are you the CEO as well?

7                   A           Yes.

8                   Q           How many employees do you have,  
9 if any?

10                  A           None.

11                  Q           How long have you owned Plural  
12 Marketing Solutions?

13                  A           I founded the company around  
14 March of 2017.

15                  Q           And what relationship, if any,  
16 is there between Plural Marketing Solutions and  
17 RevPoint Media, LLC?

18                  A           Now, none.

19                  Q           Formerly what relationship did  
20 you have?

21                  A           As of what date?

22                  Q           Well, when did your relationship  
23 stop?

24                  A           It stopped -- I mean, I would  
25 have to go back and look at my records, I'm not

1 GEORGE RIOS

2 100 percent sure, but it stopped probably  
3 around a year ago.

4 Q What did you do when you were  
5 working with RevPoint, what did Plural  
6 Marketing Solutions do with them?

7 A We are affiliate partners.

8 Q What is an affiliate partner?

9 A We basically broker consumer  
10 information through our systems and pass those  
11 records along so that they can ultimately be  
12 sold into a larger marketplace so that the  
13 requesting consumer can receive a quote on a  
14 variety of services or products.

15 Q Do you have a background in  
16 computer science?

17 A I do.

18 Q What's your education?

19 A College dropout.

20 Q And what did you study in  
21 college when you were there?

22 A Computer science; yes.

23 Q Is Plural Marketing Solutions  
24 your first job post-college?

25 A No.

1 GEORGE RIOS

2 Q Where did you work before  
3 Plural?

4 A I held different positions  
5 working with the computer science field at  
6 different companies over the last 15 or 20  
7 years.

8 Q Is Plural the first time you  
9 were self-employed?

10 A Yes.

11 Q Does Plural Marketing Solutions  
12 have any direct relationship with  
13 Quotewizard.com?

14 A No.

15 Q Do you know who Adam Brown is?

16 A Not directly, no.

17 Q How about indirectly?

18 A His name became known to me  
19 during this case.

20 Q Do you understand that at least  
21 for purposes of this deposition, we are here to  
22 determine the validity of the claim that my  
23 client, Joseph Mantha, opted in to receive  
24 calls or texts from Quotewizard.

25 Do you understand?



1                                   GEORGE RIOS

2                   A           That's my understanding.

3                               MR. MARION:  Objection to form,  
4                   but obviously it's been answered.

5                   Q           Do you have any knowledge as to  
6           whether Mr. Mantha consented to receive text  
7           solicitations from Quotewizard?

8                   A           My understanding is that he did.

9                   Q           And what do you base that on?

10                  A           I don't send any text messages  
11           or anything, but the record that we received  
12           did indicate that there was an opt-in consent.

13                  Q           And from whom did you receive  
14           that record?

15                  A           From one of my partners.

16                  Q           Which partner did you receive it  
17           from?

18                  A           From a firm called Phoenix Media  
19           Solutions.

20                  Q           Is there anything more to the  
21           name, is it an LLC or an Inc.?

22                  A           I'm afraid I don't know.

23                  Q           Do you know where they are  
24           located?

25                  A           Bosnia.

1                                   GEORGE RIOS

2                   Q           How did Phoenix Media Solutions  
3 provide -- what was the record that you  
4 referenced?

5                   A           The recording that was provided  
6 to me by Phoenix was Mr. Mantha's contact  
7 information along with some auto insurance  
8 information indicating that he was interested  
9 in an auto insurance quote at that time.

10                  Q           Did the record that you received  
11 from Phoenix Media Solutions indicate that he  
12 had opted in to receive this information on a  
13 website?

14                  A           It did.

15                  Q           What website?

16                  A           SnappyAutoInsurance.

17                  Q           Did you produce that record in  
18 response to a subpoena issued to Plural in this  
19 case?

20                  A           I did.

21                  Q           Let's look at Exhibit 22.

22                               I will ask you to scroll down  
23 after Exhibit C.

24                  A           Yes, I see it.

25                  Q           You see it? And it says at the

1                                   GEORGE RIOS

2       top "Original source lead generator"?

3                   A           Right.

4                   Q           Just so we are looking at the  
5       same page.

6                   A           Yes.

7                   Q           Is this the record that you  
8       received from Phoenix Media Solutions?

9                   A           That's correct.

10                  Q           Was it in exactly -- sorry?

11                  A           That's, just a point of  
12       clarification, this is the TCPA audits, which  
13       is sent upon request in the event that there is  
14       a discrepancy about whether or not the consumer  
15       had consented.

16                               And that's what this is.

17                               The full record has also been  
18       sent as part of the initial process when I was  
19       first contacted.

20                               That does contain some auto  
21       insurance information as well as some  
22       additional details that were provided on the  
23       form.

24                  Q           You say it has been sent. To  
25       whom has it been sent?

1                                   GEORGE RIOS

2                   A           I'm sorry, I didn't catch that.

3                   Q           You say the full record that you  
4                   received was sent.

5                                   And I was just asking to whom  
6                   was that sent?

7                   A           It was provided to RevPoint.

8                   Q           Did you send that to RevPoint  
9                   via an e-mail?

10                  A           No, it was sent as part of the  
11                  original request.

12                                  And then it was sent -- sorry,  
13                  it was sent as part of the original request  
14                  when the transaction happened, and then it was  
15                  sent again I believe through my attorney to  
16                  either Mr. King or perhaps Mr. Polansky, I'm  
17                  not sure who, but the full record was sent.

18                                  What you are looking at here is  
19                  the TCPA audit that indicates when the person  
20                  actually filled out the form and on what site.

21                  Q           And the TCPA audit, where did  
22                  that -- that we are looking at here in Exhibit  
23                  22, that came to you from Phoenix Media  
24                  Solutions in Bosnia?

25                  A           Correct; yeah. I requested this

1                                   GEORGE RIOS

2       when I was initially contacted by RevPoint that  
3       there was an issue, and as part of our normal  
4       process, I requested this information, and I  
5       forwarded it to RevPoint so they would have it  
6       for their records.

7                   Q           And was this provided to you via  
8       e-mail from Phoenix Media Solutions?

9                   A           Correct.

10                  Q           Do you still have that e-mail?

11                  A           I forwarded it already to my  
12       attorney, who I believe forwarded it off to  
13       RevPoint for their records.

14                               MR. BRODERICK:   Okay, I will just  
15       for the record say I don't believe we  
16       have seen that e-mail, and we think it's  
17       both responsive to the subpoena request  
18       and the document request to Quotewizard  
19       in the case, but I understand  
20       Mr. Polansky has an objection.

21                               MR. POLANSKY:   What?

22                               I have never seen that  
23       documentation.

24                               MR. BRODERICK:   You haven't,  
25       okay.

1                                   GEORGE RIOS

2                           MR. POLANSKY: I didn't lodge an  
3                           objection, unless -- I can't object to  
4                           something I haven't seen before.

5                           MR. BRODERICK: Okay.

6                           Well, that will be -- we will take  
7                           that up with Roger, but I think that was  
8                           responsive to our original subpoena.

9                           MR. MARION: I don't see a more  
10                          responsive request in my e-mail, which I  
11                          am looking in right now and searching  
12                          for the word Phoenix, but I will do a  
13                          search with my client, and if we come up  
14                          with a more expanded search, of course  
15                          we will provide it.

16                          MR. BRODERICK: Okay.

17                          Q           So you got an e-mail from  
18                          Phoenix Media Solutions. Was this page in the  
19                          form of a separate document attached to the  
20                          e-mail?

21                          A           I don't recall, it was probably  
22                          in the body of the e-mail, but I can't say for  
23                          sure.

24                          Q           Do you think that you then cut  
25                          and pasted that information into this document?

1                                   GEORGE RIOS

2                   A           The document that we are looking  
3                   at, yes.

4                               MR. MARION:   You can answer if  
5                               you understand the question.

6                   A           Are you asking me if I took the  
7                   body of wherever I got this and paced it into a  
8                   PDF?

9                               I believe I did do that, yes, so  
10                   that it would be in a clean format for e-mail.

11                   Q           Okay, and do you still have that  
12                   PDF?

13                   A           I am sure it's in my e-mail,  
14                   yeah.

15                               MR. MARION:   May I interject?

16                               MR. BRODERICK:   Please.

17                               MR. MARION:   Please take a look  
18                   at the following pages.   When you say  
19                   expanded information, are you talking  
20                   about the pages that follow the one you  
21                   are looking at in the same exhibit?

22                               THE WITNESS:   Well, I am looking  
23                   at page 14 of 20 of Exhibit 22, original  
24                   source lead generator.

25                               MR. MARION:   Right.   I am saying

1                                   GEORGE RIOS

2                   there are pages that follow that in the  
3                   same document.

4                               If he scrolls down, I am asking if  
5                   those are the pages he's talking about as  
6                   the expanded record.

7                               MR. BRODERICK: Could you turn  
8                   your mic up a little bit, Roger? You  
9                   are a little faint.

10                              MR. MARION: I will try and  
11                   figure out how to do that.

12                              MR. BRODERICK: Or get closer to  
13                   the mic.

14                              MR. MARION: Okay. Is that  
15                   better?

16                              MR. BRODERICK: That's better.

17                              MR. MARION: I was saying in the  
18                   same exhibit, as you scroll down, there  
19                   is other insurance related pages, and I  
20                   am wondering if that's what my client is  
21                   talking about as the expanded  
22                   information.

23                   Q           Okay, you see what follows page  
24                   14 of 20, it looks like, I'm not sure if it's a  
25                   screen shot or how that was created, but it



1                                   GEORGE RIOS

2       looks like the web page  
3       SnappyAutoInsurance.com.

4                   A           Correct, yeah, that just looks  
5       like it's a screen shot.

6                               What I was referring to  
7       specifically is what you asked me to look at in  
8       terms of the TCPA audit on that one page, which  
9       looks like it's 14 of 20. That's what I was  
10      referring to.

11                   Q           Who is your contact at Phoenix  
12      Media Solutions?

13                   A           Dario Osmancevic.

14                   Q           Do you know how to spell  
15      Osmancevic?

16                   A           Give me a second.

17                               So Dario, so the last name is  
18      O-s-m-a-n-c-e-v-i-c.

19                               MR. POLANSKY: O-s-m-a-n-c-e-v-i-  
20      c, yes, O-s-m-a-n-c-e-v-i-c.

21                   Q           Do you have his e-mail address?

22                   A           I can provide that, yes.

23                   Q           Do you see on page 14 of 20 on  
24      Exhibit 22, Adam Brown? Sorry if I just asked  
25      you this, but do you know who Adam Brown is?

1 | GEORGE RIOS

|   |   |           |
|---|---|-----------|
| 2 | A | I do not. |
|---|---|-----------|

3 Q So the only reason that appears  
4 on this document is it was provided by Phoenix  
5 Media Solutions to you?

|   |   |                   |
|---|---|-------------------|
| 6 | A | Correct; correct. |
|---|---|-------------------|

7 Q Have you ever exchanged any  
8 e-mails with Adam Brown at that e-mail address?

9                   A           I have not.

10 Q What else if anything did  
11 Phoenix Media Solutions tell you about this  
12 lead?

13                   A           Just what you see here is what  
14   they have provided to me.

15 Q And what was your e-mail, what  
16 did your e-mail say to Phoenix Media Solutions  
17 when you were trying to find out the source of  
18 the consent?

19                   A           I gave him the contact  
20   information of the person that had reached out  
21   to I guess file the requests, and she looked it  
22   up and sent me what you see here.

23 Q When you sold this lead  
24 regarding Mr. Mantha to RevPoint, did you know  
25 Mr. Mantha's name at that point?

1                                   GEORGE RIOS

2                   A           No.

3                   Q           And did you have it in your  
4   system, not what you remember, but that wasn't  
5   part of the lead that you sold?

6                               MR. MARION:  Objection to form.  
7                   You can respond if you understand the  
8   question.

9                   Q           Let me try to clean that up.  
10                               What was on the lead that you  
11   sold to RevPoint?

12                  A           I'm not sure I understand.  It's  
13   contact information.

14                  Q           But his name, the name Joe  
15   Mantha?

16                  A           Correct, yes.  The address, the  
17   city, the state, the phone number, the fact  
18   that it was not on a DNC at the time, that  
19   phone number was not on a DNC at the time, the  
20   e-mail address had been validated, and I  
21   believe there was auto insurance information on  
22   there as well in terms of the make and model  
23   and year of his vehicle.

24                  Q           Did you do anything to validate  
25   that information yourself?

1                                   GEORGE RIOS

2                   A           I'm not able to do that, no.

3                   Q           And you said the e-mail address  
4   was validated. What did you mean by that?

5                   A           Meaning that it was a properly  
6   formed valid e-mail syntactically, there were  
7   no spaces in the domain, there was no  
8   semicolons or anything that would make it an  
9   invalid e-mail.

10                  Q           But you didn't send a test  
11   e-mail to that e-mail to see if it worked?

12                  A           No.

13                  Q           Did you do anything to check  
14   what the TCPA disclosure language, if any, was  
15   on the SnappyAutoInsurance website?

16                  A           No.

17                  Q           Are you familiar with a website  
18   called Autoinsurquotes.com?

19                  A           I saw it on the documentation in  
20   this case, but prior to that, no.

21                  Q           How about -- what's the other  
22   one, maybe -- how about Quotewizard?

23                               MR. BRODERICK: No, no, excuse  
24   me. Kevin, help me out.

25                               MR. POLANSKY: Unitedquotes.com.

1                                   GEORGE RIOS

2                                   MR. BRODERICK:   Unitedquotes,  
3                                   thank you.

4                                   Q           Unitedquotes.com?

5                                   A           Thank you, yes.   That is one of  
6                                   my properties.

7                                   Q           That's one of your properties?

8                                   A           Yes.

9                                   Q           And when you say one of your  
10                                  properties, do you mean you own the domain for  
11                                  Unitedquotes.com?

12                                  A           I own the domain for  
13                                  Unitedquotes.com, correct.

14                                  MR. MARION:   Objection to form.  
15                                  When you say "I" do you mean yourself or  
16                                  an entity?

17                                  A           I mean Plural Marketing owns it.

18                                  Q           Plural Marketing owns it.

19                                  I am going to ask you to look at  
20                                  Exhibit 17 -- actually, sorry, let's go back to  
21                                  22, where we were.

22                                  I just want to note a couple of  
23                                  things about this, page 14 of 20 of Exhibit 22.

24                                  This is information you say you  
25                                  were provided by Phoenix Media Solutions.

1                                   GEORGE RIOS

2                                   It says the original source lead  
3 generator was SnappyAutoInsurance.com, correct?

4                   A           That's correct, to my  
5 understanding.

6                   Q           And is that one of your  
7 properties?

8                   A           No.

9                   Q           Do you have any relation to  
10 SnappyAutoInsurance.com?

11                  A           None.

12                  Q           Under applicant IP address --

13                  A           Yes.

14                  Q           -- I will ask you to write this  
15 down, because we are going to compare it to  
16 others. It's 96 -- hold on. 96.242.132.28.

17                  A           Yes, I see it.

18                  Q           And it also says that the  
19 applicant IP address is Morristown, New Jersey.  
20 Do you see that?

21                  A           Yes, I see that.

22                  Q           And the date of the application,  
23 and this is on the information provided to you  
24 by Phoenix Media Solutions in Bosnia, is  
25 6-26-2019 at 12:01 a.m.

1                                   GEORGE RIOS

2                   A           That's what I see here, yes.

3                   Q           And at the very bottom of this  
4 page it says, "Applicant agreed to receive  
5 promotional e-mails/calls/text/postal mails  
6 from third parties regarding his auto insurance  
7 application."

8                               What's your understanding of  
9 where that language came from?

10                  A           I can't speak to that.

11                  Q           But that was -- was that exact  
12 language provided to you by Phoenix Media  
13 Solutions in Bosnia?

14                  A           It was.

15                  Q           Now, let's go to Exhibit 17.

16                  A           Yes.

17                  Q           And here we have the same  
18 consumer IP address on this document as was on  
19 Exhibit 22, correct?

20                  A           Yes, it looks like it.

21                  Q           But this document has a Jornaya  
22 lead ID?

23                  A           Yes.

24                  Q           Did you have a Jornaya lead ID  
25 when you sold this lead to RevPoint?

GEORGE RIOS

A            That's the one that was attached  
to the record during the transaction.

Q            During which transaction?

A            When the record was initially  
sold.

Q So by Plural to RevPoint?

A            Correct.

Q Did Phoenix Media Solutions provide you with that Jornaya lead ID?

A            They provided a record that did  
not include this Jornaya lead ID.

Q Then how did it get attached to the lead during the transaction?

A I'm not entirely sure. I looked today to refresh my memory of this particular record, and I did not see that Jornaya lead ID attached.

Then I looked further and saw that it was generated on my site, one of my sites, I'm not entirely sure how it got linked, but the original record didn't include it.

Q Did you attach the Jornaya lead  
ID to this lead?

MR. POLANSKY: Can I hear that



1                                   GEORGE RIOS

2                   question again? I couldn't hear the  
3                   question.

4                   Q           Were you the one who attached  
5                   the Jornaya lead ID to Mr. Mantha's lead?

6                   A           No, I'm not sure how that  
7                   happened.

8                   Q           You don't know if someone at  
9                   RevPoint did that?

10                  A           I don't know.

11                  Q           But are you sure that you were  
12                  not provided that Jornaya lead ID by Phoenix  
13                  Media Solutions in Bosnia?

14                  A           It's possible. I have to look  
15                  and doublecheck, I'm not sure.

16                  Q           Can we look at Exhibit 18, and I  
17                  can represent to you that this is a subpoena  
18                  response in this case from Jornaya.

19                  A           Yes.

20                  Q           And that same Jornaya lead ID  
21                  appears here, and I can also represent to you  
22                  that Jornaya associates that lead ID with  
23                  Unitedquotes.com.

24                  A           Okay.

25                  Q           Can you explain why a lead that

1                                   GEORGE RIOS

2       supposedly came from SnappyAutoInsurance has a  
3       Jornaya lead ID that's associated with a site  
4       to Unitedquotes.com, which is a domain that you  
5       own?

6                   A           Well, clearly it's a mistake,  
7       because the lead was not sourced on  
8       Unitedquotes.

9                   Q           Do you have any personal  
10      knowledge that it was sourced on  
11      SnappyAutoInsurance.com?

12                  A           Only what was provided to me by  
13      Phoenix.

14                  Q           And you don't know where Phoenix  
15      got the lead, do you?

16                  A           I do not.

17                  Q           Has Phoenix ever told you  
18      anything about how they get their leads that  
19      they then sell to you?

20                  A           No.

21                  Q           Can you look at Exhibit 17,  
22      which is the Quotewizard opt-in?

23                  A           Yes.

24                  Q           Do you see the language under  
25      TCPA disclosure?

1 | GEORGE RIOS

|   |   |      |
|---|---|------|
| 2 | A | Yes. |
|---|---|------|

3 Q Did you provide that language to  
4 RevPoint?

5                   A           That may have also come from a  
6   request from Phoenix to elaborate on what the  
7   disclosure actually was at the time the  
8   consumer filled out the form.

9 Q So you got this TCPA disclosure  
10 language from Phoenix Media Solutions in  
11 Bosnia, correct?

|    |   |                |
|----|---|----------------|
| 12 | A | Correct; yeah. |
|----|---|----------------|

13 Q Then did you in turn provide  
14 that to RevPoint Media?

15                                   A                   I did.

16 Q And was that when -- after Mr.  
17 Mantha complained that he had gotten a call or  
18 rather a text message that he didn't want, were  
19 you contacted by someone at RevPoint Media?

20 MR. MARION: Objection to form.

```
21         You can answer if you understand
22         the question.
```

23                   A           Was I contacted by RevPoint  
24   Media when the complaint was lodged to them, is  
25   that the question?

1 | GEORGE RIOS

|   |   |      |
|---|---|------|
| 2 | Q | Yes. |
|---|---|------|

|   |   |      |
|---|---|------|
| 3 | A | Yes. |
|---|---|------|

4 Q Was that a phone call or an  
5 e-mail?

|   |   |                 |
|---|---|-----------------|
| 6 | A | I don't recall. |
|---|---|-----------------|

7 Q Do you still have your e-mails  
8 from 2019?

9 A I'm sure I have some. I mean

10 I --

11 Q When you responded to the  
12 subpoena to Plural Marketing Solutions in this  
13 case, did you search for e-mails?

14                                   A                   I did.

15 Q And at that time did you have  
16 them?

17                   A           I provided everything that I  
18    could find.

19 Q And to whom did you provide it,  
20 your counsel?

21 A Yes.

22 Q And did you send it to anyone  
23 else?

24           A           So, I believe the order of  
25   events were that I was contacted by RevPoint in

1                                   GEORGE RIOS

2       regards to this particular issue, it may have  
3       been over e-mail, I don't recall, or it could  
4       have been a phone call.

5                           They asked me to look into where  
6       the particular record came from.

7                           I responded with the standard  
8       TCPA information that is required when these  
9       complaints are lodged.

10                          At which point I believe a few  
11       weeks or months went by, and then I engaged my  
12       counsel to work directly with the other lawyers  
13       to basically exchange information, and I  
14       started providing the documentation to my  
15       attorneys, which in I guess just normal course  
16       gave it to the other attorneys.

17                          Q           You say the other attorneys.  
18       Was that Mr. King?

19                          A           I believe it was Mr. King, yes.

20                          Q           How about Mr. Polansky?

21                          A           I'm not sure who Mr. Polansky  
22       represents.

23                          Q           Quotewizard.

24                          A           Okay, yeah, I don't think we had  
25       any direct contact.

1 GEORGE RIOS

2 Q With anybody for Quotewizard,  
3 okay.

4 A Right.

5 Q Did you do any business with a  
6 company called Blue Flame Media?

7 A No.

8 Q How about Seal Dog Media?

9 A No.

10 Q Does Plural Marketing Solutions  
11 have a Jornaya account?

12 A Yes.

13 Q What kind of account is that?

14 A It's a standard account.

15 Q Are you a publisher, do you  
16 know?

17 A On their system I believe it's  
18 set up to be a publisher.

19 Q And can you generate your own  
20 Jornaya lead IDs, or visits to --

21 A Yes, yes.

22 Q What websites does Plural  
23 Marketing Solutions run?

24 A Unitedquotes.

25 Q Is that the only one?



1                                   GEORGE RIOS

2       capture TCPA disclosure language on the  
3       Unitedquotes.com website?

4                   A           I did.   There is one there  
5       presently.

6                   Q           When did you install that?

7                   A           I don't recall.   It's been a  
8       while.

9                   Q           Was it on the system -- I mean,  
10      Jornaya says they didn't capture any disclosure  
11      language on 6/21/2019, or whoever visited from  
12      that IP address, which is not the same as the  
13      Quotewizard ID address.

14                  A           Correct.

15                  Q           Was it months after that that  
16      you put the script on that would capture any  
17      TCPA disclosure language on Unitedquotes.com?

18                  A           I'm not sure.

19                  Q           Did you add the language  
20      following receipt of Mr. -- notice that Mr.  
21      Mantha had complained that he received an  
22      unsolicited text?

23                  A           No.

24                  Q           How do you know that?

25                  A           Looking at this now, the TCPA



1                                   GEORGE RIOS

2       Guardian, I believe that's a separate script or  
3       a separate setup that I don't believe is  
4       currently on the Unitedquotes sites.

5                           I believe all I have right now  
6       is the generic lead ID script.

7                           So I think that's why it's  
8       coming back with it can't verify the  
9       disclosure, because I don't believe it's  
10      tagged, you know, based on Jornaya's standard.

11                   Q       Okay, so you haven't added any  
12      script which would capture your -- any  
13      disclosure language on the Unitedquotes.com  
14      website?

15                   A       Correct.

16                   Q       And did the Unitedquotes website  
17      ever contain any disclosure that people signing  
18      up there to receive a quote were agreeing to  
19      receive a text message from Quotewizard.com?

20                           MR. POLANSKY:  Objection.

21                           MR. MARION:  The objection was as  
22      to form.  You can answer if you know,  
23      but he's asking if you had a very  
24      specific objection -- a very specific  
25      notice.

1                                   GEORGE RIOS

2                   A           I'm not even sure, I have to  
3   look at the specific language, and I don't know  
4   if it would contain any particular company like  
5   Quotewizard.

6                   Q           Right, I am looking at the  
7   Unitedquotes.com terms and conditions as it  
8   stands right now, and I don't see any  
9   references to specific companies that might  
10  market to visitors to the site.

11                  A           Yeah, that would be --

12                               MR. MARION:  If you understand  
13   the question you can answer.

14                               I believe -- counsel, I said to my  
15   client there is no standing question, so  
16   I'm not sure why he's speaking.

17                               I'm waiting for counsel to ask a  
18   question regarding what he's looking at.

19                  Q           I guess I am asking, I mean it's  
20   a website that you own, correct,  
21   Unitedquotes.com?

22                  A           Correct.

23                  Q           And you are the sole  
24   administrator of that website, correct?

25                               MR. MARION:  Objection to form,

1                                   GEORGE RIOS

2                   vagueness of "you."

3           A           That's correct.

4           Q           Have you ever had TCPA  
5 disclosure language on your website which  
6 stated that someone might get a text message  
7 from Quotewizard.com?

8                           MR. POLANSKY: Objection, you can  
9 answer.

10          A          So, I believe what the process  
11 is, because it wouldn't necessarily be under  
12 terms and conditions, but I believe the process  
13 would be you actually have to go through, and  
14 on the last step, where the consumer is  
15 prompted for their contact information, there  
16 is a TCPA disclosure at the bottom that does  
17 link out to a page that lists out partners, and  
18 on that partners' page, Quotewizard does  
19 appear.

20          Q          Do you have a document that  
21 shows us that with respect to Mr. Mantha's  
22 lead?

23          A          Well, Mr. Mantha didn't fill out  
24 the form on Unitedquotes.com, but I can tell  
25 you that Unitedquotes.com's TCPA disclosure on

1                                   GEORGE RIOS

2       the last step of the form does link out to this  
3       page, and that you can see it yourself, it's on  
4       Unitedquotes.com/partners.

5                   Q           But you -- but you're clear that  
6       Mr. Mantha didn't fill it out on  
7       Unitedquotes.com?

8                   A           No, because the information was  
9       provided to me by Phoenix, that he had filled  
10      it out and consented to the TCPA consent form  
11      on SnappyAutoInsurance.

12                  Q           How would you know to put  
13      Quotewizard on Unitedquotes.com if you didn't  
14      do business with them?

15                               MR. POLANSKY:  Objection.

16                               MR. MARION:  Objection to form.  
17                   You can answer to the extent that you  
18                   know.

19                  A           They are in the business, and  
20      this is a list of virtually everybody who's in  
21      the business, whether I do business with them  
22      or not.

23                  Q           Mr. Rios, my apologies if I  
24      already asked you this.  Do you know of a  
25      website called Autoinsurquotes.com?  And that's

1                                   GEORGE RIOS

2       insure without an E.

3                   A           You mentioned it earlier, and I  
4       wasn't familiar with that website until prior  
5       to seeing it involved in this matter.

6                               MR. BRODERICK:   Could we take a  
7       five minute break.   I may be close to  
8       done.

9                               MR. POLANSKY:   Sure, come back at  
10      what, 3:15?

11                              MR. BRODERICK:   Sure.   Is that  
12      okay with you, Mr. Rios?

13                              THE WITNESS:   Yes, that's fine.

14                              MR. LANDAU:   The time is  
15      approximately 3:07.   We are off the  
16      record.

17                              (At this point in the proceedings  
18      there was a recess, after which the  
19      deposition continued as follows:)

20                              THE VIDEOGRAPHER:   We are on the  
21      record.   The time is approximately 3:19  
22      p.m.   Please continue.

23                   Q           Okay, Mr. Rios, I just want to  
24      compare Exhibit 17 with Exhibit 22.

25                              We did talk about this, but I'm

1  
2  
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GEORGE RIOS

still very confused how this Jornaya lead ID came to be associated with Mr. Mantha's lead in that your subpoena response didn't have a Jornaya lead ID and the Quotewizard opt-in does?

Do you know why that is?

A I don't.

Q And the Quotewizard opt-in, which is Exhibit 17, has a lead date of 8/5/19, whereas Exhibit 22, the Plural response, has a lead date, a date of application of 6/26/2019 at 12:01 a.m.

Do you know the reason for that?

MR. POLANSKY: Objection.

MR. MARION: Objection as to form, and actually as to asked and answered.

Q Do you know why there are different application dates between the information that Plural provided and what's on the Quotewizard form?

MR. POLANSKY: Objection to characterization of lead date as the application date.

1                                   GEORGE RIOS

2                                   MR. MARION: I join in the  
3                                   objection.

4                   Q            If you know. If you don't know,  
5                   that's fine.

6                   A            I don't know.

7                                   MR. BRODERICK: Okay, I don't  
8                                   think I have any further questions,  
9                                   thank you.

10

11                   EXAMINATION BY

12                   MR. POLANSKY:

13

14                   Q            Okay, Mr. Rios. My name is  
15                   Kevin Polansky. I represent Quotewizard in  
16                   this case. I do have several questions, and I  
17                   will go through this as quickly as possible.

18                                   You said that you are the owner  
19                                   of Plural Marketing Solutions, is that right?

20                   A            That's correct.

21                   Q            And where is Plural Marketing  
22                   Solutions located?

23                   A            New Jersey.

24                   Q            Is that 30 Kern Drive Flanders,  
25                   New Jersey?

1 GEORGE RIOS

2 A That's my address, yeah.

3 Q That's your personal address?

4 A Right.

5 Q Is there a different business  
6 address for Plural Marketing Solutions?

7 A I have like a UPS store address  
8 also that I typically use for mail that's like  
9 a remote address.

10 Q What's the UPS address?

11 A That would be 220 Route 10, box  
12 number 105 Succasunna, New Jersey.

13 Q How do you spell the city name?

14 A Hold on, sorry.

15 So, I'm sorry, I am a terrible  
16 speller. It's S-u-c-c-a-s-u-n-n-a, New Jersey.

17 Q What's Plural Marketing's  
18 website?

19 A Plmrkg.com.

20 Q Now, prior to the dispute with  
21 Joseph Mantha, had you heard of the website  
22 SnappyAutoInsurance.com?

23 A No.

24 Q Is Plural Marketing in the  
25 business of generating its own leads?



1                                   GEORGE RIOS

2                   A           Not directly, no.

3                   Q           When you say not directly, what  
4   do you mean by that?

5                   A           I mean generating means like  
6   sending out e-mail or whatever, or  
7   participating in SEO or search marketing. Is  
8   that what you mean?

9                   Q           No, so I guess I will change my  
10   question.

11                               So, Plural Marketing owns  
12   Unitedquotes.com, right?

13                  A           Correct.

14                  Q           And does Unitedquotes.com  
15   generate leads?

16                  A           It does when I have traffic  
17   driven to it, yes.

18                  Q           And when traffic is driven to  
19   that website, do you then sell those leads?

20                  A           Yes.

21                  Q           Is there any other forms of lead  
22   generation that Plural Marketing engages in?

23                  A           No.

24                  Q           Is Plural Marketing, for lack of  
25   a better word, like a middleman, they buy leads

1                                   GEORGE RIOS

2       and then sell them, resell them?

3                   A           Correct, through like a  
4       ping/post mechanism.

5                   Q           Did you use the ping/post in  
6       this case with RevPoint?

7                   A           I did.

8                   Q           Did you --

9                                   MR. POLANSKY:   Strike that.

10                  Q           Did Plural Marketing purchase  
11       the Mantha lead from Phoenix Media Solutions?

12                  A           That's correct.

13                  Q           You said Phoenix Media Solutions  
14       is a partner.   What do you mean by partner?  
15       Are they just a company that you purchase leads  
16       from?

17                  A           Yes, we have a relationship that  
18       they drive traffic to me, and I then turn  
19       around and ping/post that traffic out to other  
20       partners.

21                               RevPoint happened to be one of  
22       them at that time.

23                  Q           How long have you had that  
24       relationship with Phoenix?

25                  A           Quite a while, probably over two

GEORGE RIOS

years.

Q Just about --

A I'm not sure exactly.

Q Just about from the start of the company?

A        Yes, soon after, thereabouts. I would have to check, I'm not sure exactly.

Q Do you own any share or --

MR. POLANSKY: Strike that.

Q Do you have any ownership stake in Phoenix?

A No.

Q Does Phoenix have a U.S. location?

A Not that I'm aware of. I don't know.

Q Do you have any contact information for Dario?

A Yes, I have his e-mail address.

Q And what's his e-mail address?

A           It's CEO@Phoenixmedia.com, I believe. But I would have to doublecheck that.

Q Is he the only employee of Phoenix?

1 | GEORGE RIOS

A I don't know.

He is my contact, that's all I  
can say.

Q Do you usually contact him by e-mail or phone or both?

A E-mail.

Q Have you discussed with Dario  
SnappyAutoInsurance.com?

A Just as it relates to this in terms of asking him for additional contact information when it was asked of me.

Q Do you know whether he purchased the lead from SnappyAutoInsurance.com?

A I don't. That's just what he sent to me when I requested for the TCPA information.

Q Did you pursue any diligence to ensure that SnappyAutoInsurance.com was a valid website?

A I didn't know about  
SnappyAutoInsurance until this.

Q Was this the first lead purchased from SnappyAutoInsurance?

A I don't know. I don't

1                                   GEORGE RIOS

2       necessarily always get the URLs, so I'm not  
3       sure.

4                   Q           Do you know if Dario has ever  
5       spoken to Adam Brown?

6                   A           I don't know. I assume, but I  
7       don't know.

8                   Q           And are you aware Adam Brown is  
9       the owner of SnappyAutoInsurance.com?

10                  A           Only through this process. I  
11       don't know. I wasn't aware of that name prior  
12       to this.

13                  Q           Have you ever been at any time  
14       to the SnappyAutoInsurance.com website?

15                  A           Yeah, just to look at it after  
16       it came up in this context.

17                  Q           And at the time that you looked  
18       at it, was it operative, was it still working?

19                  A           Yes.

20                  Q           Did you take any screen shots of  
21       what you saw at that time?

22                  A           Yeah, and I believe I sent them  
23       off.

24                  Q           Let's take a look at those  
25       screen shots.

1                                   GEORGE RIOS

2                                   So let's turn to Exhibit 22.

3                   A           Yes.

4                   Q           I think they are at the very  
5 bottom of the exhibit.

6                   A           Yeah.

7                   Q           Okay, so I am going to start, it  
8 looks like pages 16 of 20. Is that what you  
9 have?

10                  A           Yes.

11                  Q           And are these screen shots that  
12 you personally captured from  
13 SnappyAutoInsurance.com?

14                  A           I believe they are, yes.

15                  Q           Do you recall around what time  
16 that you captured these images?

17                  A           No, I don't.

18                               It would have been around the  
19 time that the -- it would have been around the  
20 time that we had to produce the screen shots  
21 for the information request, but I don't  
22 remember exactly what date that was.

23                  Q           Now do you see at the very top  
24 there is a URL <http://SnappyAutoInsurance.com/>?

25                  A           Yes, I see that.

1 GEORGE RIOS

2 Q Do you see where it says 58  
3 captures?

4 A Yes, I see that.

5 Q Do you know what that refers to?

6 A So, this isn't the actual  
7 website, this is the Wayback Machine.

8 Q What is it called?

9 A The Wayback Machine. So the  
10 SnappyAutoInsurance website has since gone  
11 offline. I don't know when that happened  
12 exactly.

13 But if you go to  
14 WaybackMachine.com, that's the web archive and  
15 that's where this screen shot came from.

16 Q So if you go to  
17 WaybackMachine.com -- so you went to  
18 WaybackMachine.com?

19 A To capture the images of the  
20 website at that time, yeah, because I don't  
21 believe the website was operational at that  
22 time.

23 Q Okay, so these images all come  
24 from the Wayback Machine website?

25 A That's correct, yeah.

GEORGE RIOS

Q Do you know if you clicked in all of these captures, these 58 captures?

A I'm sorry, do I know if what?

I'm sorry.

Q Sure. When you were on the  
Wayback Machine website --

A                      Yes .

Q And you were scrolling through these web images, do you know whether you scrolled through all of the 58 captures? It appears to be a hyperlink on the website?

A            No, I did not look through all  
58.

Q And there is a date here that says September 6, 2019.

Do you know what that date  
refers to?

MR. BRODERICK: Objection. This is 10 March, 2014.

A I'm not sure.

Q Sure, let me rephrase the question.

Do you see there is a period of time, it says 10 March, 2014 to 6 September,



1                                   GEORGE RIOS

2       2019?

3                   A           Yes.

4                   Q           Did you enter any sort of data  
5       points when reviewing on the Wayback Machine  
6       website?

7                               MR. BRODERICK:   Objection.

8                               THE WITNESS:   I heard an  
9       objection.   I don't know if I am allowed  
10      to answer.

11                              MR. MARION:   Yes, to the best of  
12      your recollection.

13                              THE WITNESS:   Sorry?

14                              MR. MARION:   Yes, you can answer,  
15      yes.

16                              THE WITNESS:   I can't hear you,  
17      sorry.

18                              MR. MARION:   If you recall, yes,  
19      you can answer.

20                   A           Oh, so I don't run the Wayback  
21      Machine, but my understanding, the way that it  
22      works is that there are 58 captures between  
23      these two dates, and that's what those two  
24      dates refer to.

25                                       You can click on either one of



1                                   GEORGE RIOS

2                   A           I did not.

3                   Q           Again, just to confirm, you  
4   don't recall when you went onto the Wayback  
5   Machine website?

6                   A           No.

7                   Q           Does Plural Marketing control  
8   SnappyAutoInsurance.com's website?

9                   A           No.

10                  Q           Has it ever?

11                  A           No.

12                  Q           Have you ever personally spoken  
13   to Adam Brown?

14                  A           No.

15                  Q           Now, you testified earlier that  
16   you are the only employee of Plural Marketing,  
17   is that right?

18                  A           That's correct.

19                  Q           And were you involved in the  
20   process of submitting the bid from Phoenix to  
21   RevPoint?

22                               MR. POLANSKY:   Strike that.

23                  Q           The lead --

24                               MR. POLANSKY:   Let me just start  
25   over.



1                                   GEORGE RIOS

2       turn then pings that information to RevPoint.

3                                   RevPoint will bid based on  
4       whatever they are able to get when they ping it  
5       out to their partners.

6                                   And then there is a read share  
7       that goes across everyone who is involved, and  
8       that's basically it, and this happens in  
9       seconds.

10                   Q           When the leads ping to your  
11       site, do you get notification of it?

12                   A           No.

13                   Q           Is there any human interaction  
14       on your end when the lead is pinged to your  
15       system from Phoenix?

16                   A           No.

17                   Q           Now you testified earlier that  
18       you went back before today's deposition to  
19       review whether there was a Jornaya lead ID  
20       associated with this lead, is that correct?

21                   A           Yes.

22                   Q           From the information that you  
23       have reviewed so far, you have not found a  
24       Jornaya lead ID from Phoenix to Plural, is that  
25       correct?



1                                   GEORGE RIOS

2                                   MR. MARION:   Objection to form.

3                                   You can respond if you understand.

4                                   A           Can you rephrase that?

5                                   Q           Sure.

6                                   So, there was a Jornaya lead ID  
7 associated with this lead when it went from  
8 Plural to RevPoint, right?

9                                   A           Right.

10                                  Q           We have now looked at the  
11 response received from Jornaya with respect to  
12 this lead, right, and I think you've had a  
13 chance to look at it?

14                                  A           Right.

15                                  Q           And that lead came from  
16 Unitedquotes.com, right?

17                                  A           Right.

18                                  Q           So it doesn't appear to be  
19 associated with the Mantha lead, is that right?

20                                  A           That's correct.

21                                  Q           And just because that lead or  
22 that Jornaya ID isn't associated with Mantha,  
23 doesn't mean Mantha didn't consent to the lead,  
24 is that right?

25                                  MR. BRODERICK:   Objection.

1                                   GEORGE RIOS

2                   A           That's -- I think so, yeah. I  
3   mean, because I received the consent  
4   information from Phoenix, and in the consent  
5   information it does indicate that he did  
6   provide consents. That's what I am basing that  
7   off of.

8                           MR. BRODERICK: Objection, move  
9   to strike.

10                   MR. POLANSKY: I couldn't hear,  
11   what was it?

12                   MR. BRODERICK: I objected and  
13   moved to strike, sorry.

14           Q           Do you have --

15                   MR. POLANSKY: Strike that.

16           Q           In reviewing for today's  
17   deposition, what documents did you review?

18           A           The documents that were on the  
19   Veritext site, the complaint that was sent to  
20   me some time ago, my response to the subpoena,  
21   and I believe that's it.

22           Q           And the lead information  
23   transferred from Phoenix to Plural is all  
24   electronic?

25           A           Yes.



1                                   GEORGE RIOS

2                   Q           Does it look different than the  
3 information that's provided on Exhibit 22?

4                               MR. BRODERICK: Objection.

5                   Q           In other words, despite the  
6 form, I understand this is a PDF document, is  
7 the information accessible by you, can it be  
8 generated or printed out?

9                               MR. BRODERICK: Objection.

10                  A           This information you are looking  
11 at I received from Phoenix, the information  
12 that came across from the record I provided to  
13 Mr. Moynahan.

14                  Q           Okay. Let me ask you this, and  
15 I think you just answered it.

16                               So the information attached to  
17 Exhibit 22 is what you received from Phoenix  
18 after receiving the dispute, right?

19                  A           Yes.

20                  Q           And then your testimony is you  
21 provided some other information to Mr. Moynahan  
22 at the time of -- at what time?

23                  A           When it was requested I provided  
24 the basic contact information that came across  
25 with the record plus the auto insurance, like

1                                   GEORGE RIOS

2       the vehicle information, that would make it an  
3       auto insurance quote.

4                   Q           I will turn your attention to  
5       Exhibit number 19.

6                   A           Yes.

7                   Q           Go to the page 10 of 10.

8                   A           Page what, I'm sorry?

9                   Q           10 of 10.

10                  A           10 of 10.

11                               MR. MARION:   Exhibit 19 is 12  
12       pages.

13                               MR. POLANSKY:   It's only 10 on  
14       mine.

15                  A           Oh, wait, I see it, yes.   4 of  
16       12 files.

17                  Q           I see.

18                  A           10 of 10, yeah, yeah, yeah, I  
19       see it, yeah.

20                               So this is basically what I was  
21       referring to earlier, this is the record, this  
22       is the record that comes across when an auto  
23       insurance record is put into the ping system.

24                  Q           So this is the information that  
25       Plural provided to RevPoint?

1                                   GEORGE RIOS

2                   A           Correct; yeah.

3                   Q           Do you know why, if you look at  
4   the IP address on --

5                               MR. POLANSKY:   Strike that, I'm  
6                   going to start over.

7                   Q           If you look at the IP address on  
8   this document, can you write that down?

9                   A           Okay, yeah I've got it.

10                  Q           Let go back to Exhibit 22,  
11   Plural's response.   Same page as before, after  
12   Exhibit C.

13                  A           Yes.

14                  Q           Do you know why the IP addresses  
15   are different if they are both coming from  
16   Plural?

17                  A           I can't say.   Sometimes -- I  
18   mean, I can't say exactly, but sometimes I do  
19   know that the IP address changes from partner  
20   to partner, because sometimes they append their  
21   own server's IP address either through an  
22   incorrect code or some other disconnect in  
23   mapping.

24                  Q           Do you have any written  
25   correspondence from Phoenix with the consent

1                                   GEORGE RIOS

2       information included therein from Mr. Mantha?

3                           MR. BRODERICK:   Objection.

4                   A           It's what I provided, that's  
5       what I have.

6                           It's what you are looking at on  
7       Exhibit 22 where it says original lead source  
8       generator, that's what the consent was that he  
9       provided to me when I requested it.

10                   Q           Do you know if that was a screen  
11       shot from the website, or if that was just a  
12       summary of what he believes the consent stated?

13                   A           That's what he provided to me.  
14       I don't know where he got it from.

15                   Q           Do you know what date of  
16       application means on the information on Exhibit  
17       22?

18                   A           I don't know, I'm not sure what  
19       application is referring to.

20                   Q           The information that you  
21       provided to Mr. Moynahan after receiving the  
22       dispute, is that different, does it look  
23       different, or is it in a different form than  
24       what we just looked at in Exhibit 19?

25                   A           Hold on, in Exhibit 19?

Page 61

1 | GEORGE RIOS

2 Q Yes. So if you could turn again  
3 to page 10 of 10.

|   |   |                |
|---|---|----------------|
| 4 | A | The last page? |
|---|---|----------------|

|   |   |      |
|---|---|------|
| 5 | Q | Yes. |
|---|---|------|

|   |   |                              |
|---|---|------------------------------|
| 6 | A | Yes, so I think I sent both. |
|---|---|------------------------------|

7                               So, this is the full record of  
8    what would have been sent to RevPoint, and then  
9    the TCPA audit is a -- is not all of this  
10   stuff?

11                               It's just the TCPA relevant  
12   information, and I believe I sent both to  
13   Mr. Moynahan.

14 Q So the TCPA audit does not  
15 include all of the information that Plural has  
16 to this lead?

17           A           All the information I have for  
18   this lead is what is on page 10 of 10 of  
19   Exhibit 19.   That's everything that I have.

20 Q Okay, but would you agree page  
21 10 of 10 of Exhibit 19, it doesn't include the  
22 URL for SnappyAutoInsurance.com?

23                    A               I'm sorry?

24 Q Sure. On page 10 of 10 on

25 Exhibit 19, would you agree with me that

1 GEORGE RIOS

2 SnappyAutoInsurance.com is not included on that  
3 page?

4 A Yeah, I don't see it here.

5 Q So Plural does have more  
6 information than what's contained on this  
7 document, right?

8 MR. MARION: Objection to form.

9 A No.

10 MR. BRODERICK: Objection.

11 A SnappyAutoInsurance was on the  
12 TCPA audit, that's how I got that URL, both of  
13 which were provided to Mr. Moynahan.

14 Q Okay, I think I misunderstood  
15 you, then. I thought you said all the  
16 information that Plural has is on page 10 of 10  
17 on Exhibit 19.

18 But now you've said that all the  
19 information Plural has is on page 10 of 10 on  
20 Exhibit 19 and on the TCPA audit we just looked  
21 at, Exhibit 22, is that right?

22 MR. MARION: Objection to  
23 characterization.

24 MR. BRODERICK: Objection.

25 Q Let me ask it this way --

1 | GEORGE RIOS

2                   A           I'm not -- yeah, sorry, I'm not  
3    sure what you are asking.

|   |   |       |
|---|---|-------|
| 4 | Q | Sure. |
|---|---|-------|

5                   So, in looking at page 10 of 10  
6   on Exhibit 19, and in looking at the TCPA audit  
7   that's been produced by Plural in response to  
8   the subpoena, which is identified as Exhibit  
9   22, is there any additional information that  
10   Plural has with respect to this lead?

|    |   |     |
|----|---|-----|
| 11 | A | No. |
|----|---|-----|

12 MR. MARION: I object to form.

|    |   |                              |
|----|---|------------------------------|
| 13 | Q | Do you know Michael Fishman? |
|----|---|------------------------------|

14 A I know him, yes, I know him.

15 Q Have you spoken to him about  
16 this lead?

17                   A           When it first became an issue,  
18       yeah, he called me and had told me that there  
19       was a complaint, and I said I would look into  
20       it and try to get some information back to him.

21                   And he put me in contact with  
22   Mr. Moynahan at the time, and I provided the  
23   TCPA audit that I got from Phoenix.

24 Q Did you provide that information  
25 by e-mail?

1                                   GEORGE RIOS

2                   A           I believe I did.

3                   Q           Other than that communication  
4   with Michael Fishman about the dispute, how  
5   many times have you spoken to Michael Fishman?

6                   A           In what time frame?

7                   Q           With respect to this lead?

8                   A           We haven't spoken in a while.  
9   We don't do business together anymore, yeah, I  
10   couldn't even recall the last time I spoke to  
11   him, but -- yeah, I can't even say. It's been  
12   a while.

13                  Q           Have you heard of a company  
14   called Request Path Media, Inc.?

15                  A           Yes.

16                  Q           And how do you know the company?

17                  A           That was another partner. I  
18   believe that company is dissolved.

19                  Q           Did you create that company?

20                  A           No.

21                  Q           Request Path was a company that  
22   was a partner of Plural Marketing, is that  
23   right?

24                  A           No, that was not a partner, my  
25   partner, so that was another entity that was,



1                                   GEORGE RIOS

2       another marketing company that was at one point  
3       affiliated with RevPoint, and I'm not sure who  
4       else. I don't remember.

5                   Q           How was Request Path Media  
6       affiliated with RevPoint?

7                   A           The same way that Plural  
8       Marketing is affiliated, they were just  
9       affiliated partners, sold traffic on a  
10      ping/post tree.

11                  Q           Does Request Path Media have  
12      anything to do with Unitedquotes.com?

13                  A           No.

14                  Q           Have you ever worked for Request  
15      Path Media?

16                  A           Yes.

17                  Q           What was your role at Request  
18      Path Media?

19                  A           Same thing, technology.

20                  Q           Did you create Request Path  
21      Media?

22                  A           No.

23                  Q           Just bear with me, I am trying  
24      to move a document from a private folder to  
25      this folder. I don't know how to do that.

1  
2  
3  
4  
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14  
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24  
25

GEORGE RIOS

MR. BRODERICK: You click the button to the left of it, then you can drag it.

MR. POLANSKY: The problem is they didn't give me like a folder. So if I click exhibit, it goes into the Plaintiff's Exhibit folder from the other day.

MR. BRODERICK: Meaning marked exhibits?

MR. POLANSKY: Yes.

MR. BRODERICK: I think that's okay, it will just be marked sequentially.

MR. POLANSKY: I don't think he has access to the marked exhibits for Joe Mantha.

MR. BRODERICK: Oh, I see. Which one is it?

MR. POLANSKY: Which document?

MR. BRODERICK: Which do you want it moved into?

MR. POLANSKY: I want to move in a new document called a Request Path

1                                   GEORGE RIOS

2                   Media Florida business filing  
3                   incorporation for Request Path Media.

4                   MR. BRODERICK:   Okay, yeah, I  
5                   don't have that.

6                   MR. POLANSKY:   No.

7                   Wait, I might have figured this  
8                   out. I don't know why they don't give me  
9                   access.

10                  Q           Let me ask you this question,  
11                  Mr. Rios. Did you incorporate Request Path  
12                  Media?

13                  A           The initial incorporation  
14                  possibly I was on, but it got transferred to  
15                  someone else, and it's kind of personal why, I  
16                  mean --

17                  Q           I mean, you understand that you  
18                  incorporated this company on March 3, 2015, is  
19                  that right?

20                  A           Yes, so I transferred it to --  
21                  okay, so I was in the middle of, or I should  
22                  say I was in the beginning of a divorce.

23                               And that company was the company  
24                  that I was at the time had an ownership share,  
25                  and I was worried that that ownership share

1                                   GEORGE RIOS

2       would then come into the context of the divorce  
3       and make it that much more difficult.

4                               So I transferred the ownership  
5       to another person, and then we operated under  
6       that company for a period of time, and then it  
7       got shut down.

8                   Q           Okay. Is that when you created  
9       RevPoint Media?

10           A           I didn't create RevPoint Media.

11           Q           Sorry, Plural Marketing  
12       Solutions?

13           A           Right.

14           Q           At any point in time did Request  
15       Path Media operate Unitedquotes.com?

16           A           It might have been -- yeah, I  
17       mean, I don't remember exactly, it might have  
18       been a brand or one of the brands, but I don't  
19       think it was actually. I don't recall.

20           Q           Do you know anyone by the name  
21       of Peter Petrov?

22           A           No.

23           Q           What about Mario Guerrero?

24           A           No.

25           Q           Justin Cohen?

GEORGE RIOS

A No.

Q And I think this was asked, but I apologize, I don't have it written down. Have you heard of Blue Flame Marketing, Inc.?

A            No, no.

Q How far is your address from  
Morristown, New Jersey, your business address?

A      Maybe 30 minutes, give or take.

MR. POLANSKY: I think that might be all I have. Just give me a moment.

If you want we can go off or I can just look at my notes. It doesn't matter.

MR. BRODERICK: How long do you want to go off for, Kevin?

MR. POLANSKY: Three or four minutes. I just want to collect my thoughts. Come back around 4:02.

THE VIDEOGRAPHER: Okay. The time is approximately 3:57. We are off record.

(At this point in the proceedings  
there was a recess, after which the  
deposition continued as follows:)

MR. LANDAU: We are on the

1                                   GEORGE RIOS

2                   record, the time is approximately 4:02  
3                   p.m. Please continue.

4                   Q           Mr. Rios, I only have a couple  
5                   of more questions.

6                                   Did you say that Phoenix Media  
7                   Solutions is located in Bosnia?

8                   A           Yes.

9                   Q           Do you know if Dario, I can't  
10                  pronounce his last name, lives in Bosnia or  
11                  some other location?

12                  A           To my knowledge he lives in  
13                  Bosnia, but I'm not sure.

14                  Q           How did you meet Dario?

15                  A           I don't recall.

16                  Q           How did you get in touch with  
17                  Phoenix?

18                  A           Someone made an introduction at  
19                  some point, I don't remember where, through  
20                  e-mail, and we started talking over e-mail and  
21                  that was it.

22                                  I sent him my spec, that was it.

23                                  I mean, it's sort of like the  
24                  same way that I got engaged with RevPoint or  
25                  anybody else.

1                                   GEORGE RIOS

2                   Q           You testified earlier that on  
3   the Unitedquotes website you only have the  
4   generic lead ID script for Jornaya, is that  
5   correct?

6                   A           That's correct.

7                   Q           What comes with the generic lead  
8   ID script? In other words, what's captured by  
9   that script?

10                  A           I don't know, I can't really  
11   speak to Jornaya's technology.

12                  Q           But the consent information is  
13   not tagged with the script?

14                               MR. MARION: Objection to form.  
15                   You can answer to the extent you know.

16                  A           I don't really know how that  
17   piece works.

18                               It doesn't look like it is  
19   working correctly based on what I saw here, and  
20   I would need to look at it further and  
21   understand what's wrong. I don't know.

22                  Q           Do you have any understanding  
23   for why the Jornaya lead ID was attached to the  
24   lead when provided to RevPoint?

25                  A           No.

1                               GEORGE RIOS

2                               MR. POLANSKY: No further  
3                               questions. Thank you for your time.

4                               MR. MARION: No, no, we are not  
5                               done yet. First of all, Ted, do you  
6                               have any more questions?

7                               MR. BRODERICK: I do not. Thank  
8                               you, Roger.

9                               MR. MARION: So I am going to ask  
10                              a couple of follow-up questions just  
11                              because you guys didn't.

12

13       EXAMINATION BY

14       MR. MARION:

15

16                              Q           So, do you have a contractual  
17                              relationship with Phoenix?

18                              A           Yes, I do.

19                              Q           Did Phoenix make any  
20                              representations in its contract regarding TCPA  
21                              compliance?

22                              A           Yes. He said everything he sold  
23                              to me would be compliant and he would be able  
24                              to provide that documentation in the event that  
25                              it was necessary.



1 GEORGE RIOS

2 Q And did it warrant compliance in  
3 any way?

4 A Yes, I believe that's what the  
5 contract states.

6 MR. MARION: Nothing further.

7 MR. LANDAU: Anyone else have any  
8 questions?

9 MR. POLANSKY: I just have one  
10 follow-up.

11

12 CONTINUED EXAMINATION BY

13 MR. POLANSKY:

14

15 Q Does Plural have a contract with  
16 RevPoint?

17 A Not active.

18 Q Right, but did it have a  
19 contract requiring TCPA compliance from Plural?

20 A Yes; I believe that was part of  
21 the agreement as well.

22 MR. POLANSKY: Okay, nothing  
23 further.

24 MR. BRODERICK: Nothing further  
25 from me. Thank you, Mr. Rios.

1                               GEORGE RIOS

2                               THE WITNESS:   Thank you very  
3                               much.

4                               THE VIDEOGRAPHER:   This concludes  
5                               today's testimony given by George Rios  
6                               consisting of one media unit and it will  
7                               be retained by Veritext New England.

8                               At this time it is 4:06 p.m.   We  
9                               are off the record.

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1 GEORGE RIOS

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3  
4 I, the undersigned, a Certified  
5 Shorthand Reporter of the State of New  
6 York, do hereby certify:

7 That the foregoing proceedings were  
8 taken before me at the time and place  
9 herein set forth; that any witnesses in  
10 the foregoing proceedings, prior to  
11 testifying, were duly sworn; that a record  
12 of the proceedings was made by me using  
13 machine shorthand which was thereafter  
14 transcribed under my direction;

15 That the foregoing transcript is a  
16 true record of the testimony given.

17 Further, that if the foregoing  
18 pertains to the original transcript of a  
19 deposition in a federal case before  
20 completion of the proceedings, review of  
21 the transcript [ ] was [x ] was not  
22 requested.

23 I further certify I am neither  
24 financially interested in the action nor a  
25 relative or employee of any attorney or  
party to this action.

IN WITNESS WHEREOF, I have this  
date subscribed my name.



Stephen J. Moore  
RPR, CRR  
Dated: 8/11/2020

1                                   GEORGE RIOS

2                   DECLARATION UNDER PENALTY OF PERJURY

3                                   Case Name: MANTHA v. QUOTEWIZARD

4                                   Date of Deposition: July 28,  
5                                   2020

6  
7                                   I, GEORGE RIOS, hereby certify

8                                   Under penalty of perjury under the  
9                                   laws of the State of New York that the  
10                                  foregoing is true and correct.

11                                  Executed this \_\_\_\_\_ day of  
12                                  \_\_\_\_\_, 2020, at  
13                                  \_\_\_\_\_.

14  
15  
16                                  \_\_\_\_\_  
17  
18                                  GEORGE RIOS

GEORGE RIOS

## DEPOSITION ERRATA SHEET

Case Name: MANTHA v. QUOTEWIZARD

Name of Witness: GEORGE RIOS

Date of Deposition: July 28,  
2020Reason Codes: 1. To clarify the  
record.

2. To conform to the facts.

3. To correct transcription errors.

|    |      |       |      |       |        |       |
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DEPOSITION ERRATA SHEET

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| 18 | From | _____ |      |       | to     | _____ |

\_\_\_\_\_ Subject to the above  
changes, I certify that the transcript is  
true and correct

\_\_\_\_\_ No changes have been  
made. I certify that the transcript is  
true and correct.

\_\_\_\_\_  
GEORGE RIOS

[&amp; - asked]

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[driven - generator]

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